

May 2, 2005

Ms. Kimberly Tisa
EPA New England, Region 1
1 Congress Street
Suite 1100 (CPT)
Boston, MA 02114-2023

Re: McCoy Field Site
225 Hathaway Boulevard
New Bedford, MA 02740

Dear Ms. Tisa:

This letter addresses review comments presented in your letter to the City of New Bedford dated April 19, 2005. The review comments are related to the *Risk-Based Cleanup Request, Rev. 0, March 21, 2005*, for the School Site at the above-referenced location, submitted by BETA Group, Inc. on behalf of the City of New Bedford.

EPA Comment #1 – Related to Warning Barrier

The warning barrier has or will be placed in all landscaped areas. The warning barrier will not be placed in paved areas or beneath the building footprint. BETA corrected references to the warning barrier locations in Sections 1.3, 3.3.3, and 3.3.4.

EPA Comment #2 – Related to Figures showing sampling locations

Aside from the landscape area samples, the colors of the symbols denoting sample locations were arbitrary. The colors were used only to facilitate identification of sample IDs and corresponding locations. The figures have been revised so that all sample locations are shown in black. Also, the landscaped area samples are illustrated on a new Figure 1.6.

EPA Comment #3 – Related to interpretation of Figures 1.3 thru 1.5 with respect to Figures 1.1 and 1.2

Figures 1.3 through 1.5 denote sample locations within the building footprint shown on Figures 1.1 and 1.2. Building Sections A, B, and C are labeled on Figures 1.1 and 1.2 for reference.

EPA Comment #4 – Related to shading of exceedances in PCB analytical results for the Landscaped Area

Exceedances in the PCB analytical results spreadsheet for the Landscaped Area (Appendix C) were inadvertently not shaded. The subject spreadsheet for the Landscaped Area (Appendix C) has been corrected to include shading for exceedances.

EPA Comment #5 – Related to distinction on sample types.

Appendix C was revised so that, for each area of the School Site (i.e. Landscaped Area, Pile Caps, Grade Beams, etc.), the samples are divided into the following categories:

1. Characterization Samples
2. Delineation Samples
3. Confirmation/Remaining Samples

Section 2.2 was expanded to include a discussion on the difference between the types of samples.

EPA Comment #6 – Related to units presented in data tables for PCBs

Appendix C was revised so that all PCB results are reported in units of mg/kg (ppm).

EPA Comment #7 – Related to Groundwater Results

The raw chromatograms for the PCB Aroclor results reported in Alpha laboratory report L0211201 have been reviewed. The surrogate recoveries are within the acceptable range for all samples. The baselines of the chromatograms for each column are normal. There is no evidence of detection of any PCB Aroclors on any of the chromatograms. A hardcopy of the backup for Alpha laboratory report L0211201 has been included in Attachment D.

EPA Comment #8 – Related to QA/QC discussion on Data Usability

A conservative approach was utilized to determining whether fill material would be handled as PCB remediation waste < 50 ppm or PCB remediation waste > 50 ppm, as evidenced by the following:

1. The limits of excavation for PCB remediation waste > 50 ppm were conservative in that we excavated to a sample location known to contain < 50 ppm.
2. BETA requested that the laboratories alert us when they suspected presence of non-Aroclor PCBs so that we could decide whether to proceed with congener analysis by Method 680. When we did not analyze the sample by Method 680 upon the laboratory recommendation, we assumed the sample contained > 50 ppm PCBs.
3. In the event that a duplicate sample was analyzed, BETA based disposal decisions on the higher concentration sample. For instance, if a duplicate sample contained < 50 ppm PCBs but the corresponding sample contained > 50 ppm PCBs, then the material was disposed of as PCB remediation waste > 50 ppm.

Section 2.4 on Data Validation and Usability has been added to the Risk-Based Cleanup Request.

EPA Comment #9 – Related to Identification of associated reference sample for Duplicate Samples

Inadvertently, the associated reference samples for some of the duplicates listed in the tables provided in Appendix C were not identified. The PCB analytical results spreadsheets have been corrected (Appendix C) to identify samples associated with duplicate samples.

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EPA Comment #10 – Related to Long-Term Monitoring and Cap Maintenance Plans

Attachment E (Long-term Cap Monitoring Plan) has been revised to include more detailed discussion on the engineered cap maintenance. Attachment F (Environmental Monitoring Plan) has also been revised to include a more detailed discussion on indoor air monitoring, including methodologies and action limits.

We trust these responses adequately address the questions and concerns raised during your supplemental review of the application; however, we will be available to address any further questions or concerns that may arise. Please call either Jackie Huggins or me with any questions related to the contents of this letter or any further concerns that may arise.

Very truly yours,

BETA GROUP, INC.

Alan D. Hanscom, P.E., LSP
Associate

Cc: Gerard Martin, MADEP
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